

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

KANAUTICA ZAYRE-BROWN,

*Plaintiff,*

v.

No. 3:22-cv-00191

THE NORTH CAROLINA  
DEPARTMENT OF ADULT  
CORRECTIONS, *et al.*,

*Defendants.*

**DECLARATION OF JON W. DAVIDSON**

1. My name is Jon W. Davidson, and I am a Senior Counsel at the American Civil Liberties Union Foundation (“ACLU”) and am one of the counsel for Plaintiff Kanautica Zayre-Brown (“Plaintiff”) in the above-captioned case. I am admitted pro hac vice in this case.

2. The ACLU is a non-profit civil rights organization and law firm that works to defend and advance the individual rights and liberties that the Constitution and the laws of the United States guarantee for everyone in this country.

3. The ACLU does not charge its clients for its services.

4. The ACLU is co-counsel in this litigation together with the ACLU of North Carolina and Patterson Harkavy LLP, which assisted in this litigation on a pro bono basis. While the ACLU of North Carolina was lead counsel in this case, the ACLU was actively involved at every point in representing Plaintiff in this litigation,

including drafting pleadings and briefs, taking and defending depositions, drafting and responding to written discovery, and examining witnesses at the evidentiary hearing held in this case.

5. I graduated from Yale Law School in 1979. I then served as a law clerk for the late Hon. Wm. Matthew Byrne, Jr., who was a United States District Court judge for the Central District of California. After my clerkship, I became an associate and subsequently a partner at the Los Angeles law firm of Irell & Manella, specializing in complex civil litigation. I joined the staff of the ACLU Foundation of Southern California as staff counsel in 1988 and thereafter was promoted to senior staff counsel. In 1995, I moved from the ACLU Foundation of Southern California to Lambda Legal Defense and Education Fund (“Lambda Legal”), which is the nation’s oldest and largest nonprofit legal organization specializing in the rights of lesbian, gay, bisexual, transgender, queer, and other sexual and gender identity minority (“LGBTQ+”) people and people living with HIV. I began at Lambda Legal as a supervising attorney, subsequently was promoted to senior counsel, and then was selected to become the organization’s national legal director, a position I served in for more than 12 years. In that position, I ultimately supervised a legal team of 31 attorneys and 16 support staff across Lambda Legal’s six offices nationwide. After 22 years at the organization, I departed in 2017 to briefly become a consultant for several nonprofit entities on LGBTQ+ rights issues and then, in 2018, I became Chief Counsel at Freedom for All Americans, a nonprofit organization working to obtain statutory protections against gender identity and sexual orientation discrimination

nationwide. In February of 2022, I left that organization to return full-time to litigation at the national ACLU, working from Los Angeles. I also have served as an adjunct professor at the UCLA School of Law, the University of Southern California Law Center, Loyola Law School, and the former Whittier Law School, teaching classes that, among other matters, addressed the rights of transgender and other LGBTQ+ individuals.

6. During my career, I have been counsel in numerous matters involving the rights of transgender individuals, including, among others, *Orr v. Trump*, 2025 WL 1695941 (D. Mass. June 17, 2025) (granting a preliminary injunction to a nationwide class of transgender, intersex, and nonbinary Americans against a recently adopted federal policy requiring listing one's sex assigned at birth on new, renewed, or replaced passports); *Bridge v. Oklahoma State Dept. of Education*, 2024 WL 150598 (W.D. Okla. Jan 12, 2024), *appeal pending*, No. 24-6072 (10th Cir.) (challenging state law barring use of school restrooms inconsistent with one's sex assigned at birth); *Karnoski v. Trump*, 2017 WL 6311305 (Dec. 11, 2017) (granting a preliminary injunction against an Executive Order that barred transgender individuals from serving in the military); and *Carcaño v. McCrory*, 203 F. Supp. 3d 615 (M.D.N.C. 2016) (granting a preliminary injunction against enforcement of a state law barring transgender individuals from accessing multi-user restrooms and other single-sex facilities unless they have changed the gender marker on their birth certificate). I have also been counsel in multiple cases representing incarcerated people, specifically including litigation involving the right of incarcerated transgender individuals to obtain gender-affirming surgery.

*See, e.g., Rosati v. Igbinoso*, 791 F.3d 1037 (9th Cir. 2015) (reversing dismissal of transgender prisoner's complaint seeking gender-affirming surgery).

7. In addition to myself, several other lawyers from the ACLU worked on the instant litigation, including Li Nowlin-Sohl, who is a Senior Staff Attorney at the ACLU. Ms. Nowlin-Sohl graduated from New York University School of Law in 2011. She was in private practice at the firm of Paul Hastings LLP for three years from 2011 to 2014, during which time she handled a wide range of civil litigation matters. She then served as a clerk for the late Hon. Judge Gladys Kessler on the U.S. District Court for the District of Columbia. Prior to joining the staff of the ACLU, she worked for five years at the ACLU of Washington and one year at the firm of Keller Rohrbach LLP.

8. During her career, Ms. Nowlin-Sohl has been counsel in many cases involving the rights of transgender individuals, including *Orr v. Trump*, *supra*; *L.E. v. Lee*, 728 F. Supp. 3d 806 (M.D. Tenn. 2024) (granting a preliminary injunction requiring defendants to permit transgender boy to seek to join boys' high school golf team notwithstanding state Gender in Athletics Law); *Poe v. Labrador*, 709 F. Supp. 3d 1169 (D. Idaho 2023) (granting a preliminary injunction in pending challenge to Idaho law criminalizing provision of gender affirming medical care to youth); *Brandt v. Rutledge*, 47 F.4th 661 (8th Cir. 2022) (affirming grant of a preliminary injunction in pending challenge to Arkansas law criminalizing provision of gender affirming medical care to youth); *Enstad v. PeaceHealth*, No. 2:17-cv-01496 (W.D. Wash. 2019) (challenge to medical plan's exclusion of gender affirming care for transgender individuals); and *Robbins v. Swedish Health Services*, No. 17-2-32900-2 (Wash. Superior Ct. 2017) (challenge to discriminatory actions against transgender patient). She has also been counsel in numerous cases representing incarcerated transgender individuals, specifically including litigation seeking the provision of gender affirming

medical care, including surgery. These include *Kingdom v. Trump*, 2025 WL 1568238 (D.D.C. June 3, 2025) (granting class certification of individuals incarcerated in federal prisons who have been or will be diagnosed with gender dysphoria and granting preliminary injunction requiring restoration and maintenance of access to treatment for gender dysphoria); *Keohane v. Dixon*, No. 2:24-cv-4334 (N.D. Fla. 2024) (pending class action challenging Florida Department of Corrections policy prohibiting gender affirming health care to incarcerated individuals); and *Iglesias v. Bureau of Prisons*, 2021 WL 6112790 (S.D. Ill. Dec. 27, 2021) (granting preliminary injunction requiring evaluation of transgender woman's request for gender affirming surgery in case in which a settlement to receive gender affirming surgeries was subsequently achieved).

9. Attached to this declaration as Attachments 1 and 2 are compilations of my and Ms. Nowlin-Sohl's time on this case showing the tasks for which the ACLU seeks fees. In the exercise of billing judgment, entries that may have been duplicative, excessive, redundant, or otherwise unnecessary have been removed. Entries for time spent briefing Plaintiff's motion for a preliminary injunction and that that could be identified as only relating to Plaintiff's unsuccessful claims have been removed. In all, more than 450 hours billed by Ms. Nowlin-Sohl and me have been removed. In addition, the ACLU is only seeking fees for Ms. Nowlin-Sohl and myself even though other lawyers, paralegals, and law students working at the ACLU spent an extremely large number of hours working on this case.

10. All time entries in the Attachments 1 and 2 were recorded contemporaneously in tenth-of-an hour increments with the work being done using a computer-based system, as is the regular practice of attorneys at the ACLU for all cases that are potentially fee-generating.

11. The time entries in the attached exhibits reflect time spent over a period of more than three years investigating this case; drafting the complaint; defeating Defendants' motion to dismiss; conducting extensive discovery, which included reviewing thousands of documents and taking or defending fifteen depositions, including five expert depositions; partially defeating Defendants' Rule 35 motion; routine litigation tasks including legal research, setting legal strategy, client communications, and communications with co-counsel; two rounds of summary judgment briefing; briefing *Daubert* motions to exclude Defendants' expert witnesses; preparing for and participating in an evidentiary hearing; defeating Defendants' motion to stay the Court's permanent injunction before this Court and the Fourth Circuit; merits briefing at the Fourth Circuit; and responding to Defendants' submissions in response to this Court's permanent injunction. As noted above, time spent by Ms. Nowlin-Sohl or me on the case that was duplicative of that spent by our co-counsel (such as attending depositions they took) has been removed. I believe that the work Ms. Nowlin-Sohl and I performed in connection with all these tasks was reasonably necessary to the successful prosecution of this case.

12. The ACLU seeks an hourly rate of \$262.50, the maximum currently allowed by the Prison Litigation Reform Act (PLRA), for the work of Ms. Nowlin-Sohl

and me on this case. Based on the skill and experience of Ms. Nowlin Sohl and myself in litigating cases such as this, as well as my understanding of market rates in this District, these rates are reasonable and are significantly lower than those paid to attorneys of comparable experience in the private market without the PLRA's caps.

13. The ACLU's loadstar for 82.8 hours of Ms. Nowlin-Sohl's work and 364.3 hours of my work (totaling 447.1 hours) at the current PLRA rate is \$117,363.75. This includes \$1,496.25 for 5.7 hours Ms. Nowlin-Sohl and I expended preparing Plaintiff's motion for attorney's fees and supporting materials.

14. The ACLU intends to submit a bill of costs to recover a total of \$1,231.40 in recoverable costs that it incurred in this case. In addition, the ACLU seeks to recover \$6,246.35 in travel expenses (for airline flights, ground transportation, and lodging), relating either to ACLU attorneys attending the evidentiary hearing in this matter where we examined and cross-examined witnesses or to traveling to be the lead in taking or defending depositions in this case. These expenses are itemized in Attachment 3 hereto.

15. As a non-profit organization with limited resources, the ACLU must be judicious in selecting cases to litigate. Litigating this case over the course of years Ms. Nowlin-Sohl and I were involved limited the ability of Ms. Nowlin-Sohl and myself to take on other matters litigating important civil liberties issues.

16. In my experience, private law firms are rarely willing to devote the significant resources required over a lengthy period of time to adequately represent plaintiffs in cases such as this one involving a transgender woman seeking gender

affirming medical care while in prison. Such cases rarely result in significant financial recoveries that private law firms seek. Obtaining private counsel to represent individuals such as the Plaintiff has become even more challenging in light of the attitudes of government officials and the public regarding the rights of transgender people, which have grown increasingly hostile since this case was filed in 2022. The ACLU has tracked more than 1,900 bills introduced during this period in state legislatures and Congress attacking the rights of transgender people in a wide variety of contexts, including the rights of transgender individuals who are incarcerated. Scores of such laws have been enacted during this period. Actual or even purported support for transgender rights have been the focus of sustained attacks on political candidates, with reports of more than \$21 million spent on anti-transgender and anti-LGBTQ television ads in 2024. One candidate for president in 2024 was repeatedly vilified for having responded to a candidate questionnaire from the ACLU that, if she were elected, she would support the right of transgender people in prison to have access to comprehensive treatment associated with gender transition including necessary surgical care. Cases such as this one accordingly almost always require the involvement of public interest legal organizations such as the ACLU to vigorously litigate.


17. In my experience, successfully litigating a case such as this one requires substantial amounts of time from highly skilled litigators with experience in constitutional law, the rights of transgender individuals, and the rights of incarcerated individuals.



18. Given the complexity of this case, its subject matter, the degree of success achieved, and the need to incentivize competent attorneys to represent incarcerated and transgender clients, I believe the total amount of fees the ACLU seeks in this matter are reasonable.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.

Signed this the 21st day of July, 2025.

  
\_\_\_\_\_  
Jon W. Davidson

2/1/2022	Jon W Davidson	0.5	Discuss case with ACLU Legal Director and review case memo
2/9/2022	Jon W Davidson	0.5	Call with ACLU Legal Director and Deputy Legal Director re case status, staffing, and plans for proceeding
2/14/2022	Jon W Davidson	0.5	Call with ACLU Legal Director re complaint, preliminary injunction motion, and exhaustion issues
2/17/2022	Jon W Davidson	0.6	Call with co-counsel re complaint, preliminary injunction motion, expert witness declaration, and timing
2/17/2022	Jon W Davidson	0.2	Review and edit expert engagement agreement
2/18/2022	Jon W Davidson	0.2	Review and edit client retainer and co-counsel agreement
2/23/2022	Jon W Davidson	0.2	Review revised client retainer, co-counsel agreement, and expert engagement letter
2/23/2022	Jon W Davidson	1	Call with co-counsel re co-counsel agreement, complaint, venue, and expert
2/24/2022	Jon W Davidson	0.5	Call with expert witness Dr. Randi Ettner
2/24/2022	Jon W Davidson	0.1	Email Dr. Ettner re expert engagement letter
2/24/2022	Jon W Davidson	0.2	Email legal assistant re preparation and filing of pro hac vice motion
2/27/2022	Jon W Davidson	1.5	Review and edit draft complaint
3/1/2022	Jon W Davidson	0.5	Call with co-counsel re complaint, preliminary injunction motion, retainer, co-counsel agreement, and expert issues
3/1/2022	Jon W Davidson	0.3	Review edits to retainer and co-counsel agreement and make further revisions
3/2/2022	Jon W Davidson	1.4	Review and edit draft motion for preliminary injunction
3/2/2022	Jon W Davidson	0.1	Email co-counsel re client declaration
3/3/2022	Jon W Davidson	1	Call with client and co-counsel re filing of complaint and preliminary injunction motion
3/4/2022	Jon W Davidson	0.3	Review and edit further revised client retainer and co-counsel agreement
3/8/2022	Jon W Davidson	0.3	Call with co-counsel re status of retainer, co-counsel agreement, complaint, preliminary injunction motion, medical records review, and client declaration
3/8/2022	Jon W Davidson	0.2	Finalize co-counsel agreement, and email executed version to team
3/8/2022	Jon W Davidson	0.2	Review local rules re pro hac vice requirements and email co-counsel
3/9/2022	Jon W Davidson	0.3	Review edits to complaint and respond
3/17/2022	Jon W Davidson	0.7	Research Prison Litigation Reform Act issues and email co-counsel re how to address them
3/20/2022	Jon W Davidson	0.5	Review and edit client declaration and email to co-counsel
3/21/2022	Jon W Davidson	0.2	Emails with ACLU National Prison Project attorneys re review of complaint
3/22/2022	Jon W Davidson	1	Call with co-counsel re client declaration, upcoming call with client, and status of complaint and preliminary injunction motion
3/23/2022	Jon W Davidson	0.3	Call with client re her declaration and case status
3/23/2022	Jon W Davidson	0.2	Emails with co-counsel re prison records and timeline
3/28/2022	Jon W Davidson	0.8	Call with client re finalization of complaint and preliminary injunction motion and anticipated plans for the lawsuit
3/29/2022	Jon W Davidson	0.2	Research medical exam issues and email co-counsel regarding them
4/4/2022	Jon W Davidson	0.1	Review and respond to co-counsel emails re client release date
4/4/2022	Jon W Davidson	0.8	Research provision of gender-affirming surgery to prisoners
4/4/2022	Jon W Davidson	0.8	Review and edit motion to compel and emails with opposing counsel re status and outstanding tasks
4/6/2022	Jon W Davidson	3.3	Edit revised complaint and email co-counsel regarding it
4/7/2022	Jon W Davidson	0.5	Further edit revised complaint
4/7/2022	Jon W Davidson	0.1	Email ACLU National Prison Project attorneys re review of complaint
4/12/2022	Jon W Davidson	1.1	Research damages available under 8 <sup>th</sup> Amendment and Prison Litigation Reform Act and email co-counsel re research
4/12/2022	Jon W Davidson	1.5	Call with client followed by call with co-counsel re further amendments to complaint and outstanding tasks
4/12/2022	Jon W Davidson	0.3	Research issues re verification of complaint and email co-counsel re research
4/15/2022	Jon W Davidson	0.1	Email co-counsel re client retainer
4/19/2022	Jon W Davidson	0.2	Email co-counsel re vulvoplasty allegations
4/19/2022	Jon W Davidson	0.9	Call with co-counsel re complaint, preliminary injunction motion, and motion to compel
4/19/2022	Jon W Davidson	0.7	Review and edit further revised complaint and email co-counsel regarding it
4/19/2022	Jon W Davidson	0.6	Research qualified immunity issues and email co-counsel re research
4/20/2022	Jon W Davidson	0.6	Review and revise complaint allegations re vulvoplasty
4/21/2022	Jon W Davidson	1.2	Review and edit revised preliminary injunction motion and email co-counsel regarding it
5/2/2022	Jon W Davidson	0.1	Review Rule 34 request and email co-counsel
5/3/2022	Jon W Davidson	0.6	Redact draft preliminary injunction motion and email DOJ attorneys re statement of interest and draft preliminary injunction motion
5/5/2022	Jon W Davidson	0.2	Revise pro hac vice motion and email executed version to co-counsel
5/10/2022	Jon W Davidson	0.6	Call with co-counsel re outstanding tasks
5/16/2022	Jon W Davidson	0.6	Review and edit revised brief in support of motion for preliminary injunction
5/17/2022	Jon W Davidson	0.5	Call with client and co-counsel re next steps
5/26/2022	Jon W Davidson	0.4	Emails with co-counsel re Dr. Ettner's examination of client and Ettner expert declaration
5/31/2022	Jon W Davidson	0.8	Call with co-counsel re preliminary injunction motion, expert declaration, and contacting Jennifer Doula and Dr. Figler
6/1/2022	Jon W Davidson	0.5	Edit client's declaration in support of preliminary injunction motion
6/8/2022	Jon W Davidson	0.3	Call with client re status of litigation
6/9/2022	Jon W Davidson	2.9	Review Dr. Ettner's declaration and draft possible edits to discuss with her and send to co-counsel
6/13/2022	Jon W Davidson	0.3	Call with co-counsel re finalizing components of preliminary injunction motion
6/23/2022	Jon W Davidson	0.2	Review and edit client declaration in support of preliminary injunction motion
6/24/2022	Jon W Davidson	0.3	Draft and review email to Dr. Ettner re her declaration
6/24/2022	Jon W Davidson	0.5	Review motion to dismiss and email co-counsel re opposition arguments
6/27/2022	Jon W Davidson	0.4	Review and further edit revised motion for preliminary injunction
6/28/2022	Jon W Davidson	0.2	Final review of motion, brief, and declarations in support of preliminary injunction
6/28/2022	Jon W Davidson	0.5	Call with co-counsel re opposition to motion to dismiss

7/6/2022	Jon W Davidson	1	Review and edit opposition to motion to dismiss
7/12/2022	Jon W Davidson	0.5	Review and edit revised opposition to motion to dismiss
7/19/2022	Jon W Davidson	0.3	Call with co-counsel re response to opposition to preliminary injunction motion
7/19/2022	Jon W Davidson	0.5	Analyze opposition to preliminary injunction and supporting documents
7/20/2022	Jon W Davidson	0.5	Review outline of reply to opposition to motion for preliminary injunction and email co-counsel re additional arguments to consider
7/26/2022	Jon W Davidson	0.3	Review and edit draft reply to opposition to motion for preliminary injunction
1/3/2023	Jon W Davidson	0.5	Call with co-counsel re expert issues
1/4/23	Jon W Davidson	0.7	Review amicus brief in Edmo litigation and email co-counsel re them and re potential additional experts
1/5/2023	Jon W Davidson	0.8	Call with client re status of litigation
1/5/2023	Jon W Davidson	0.1	Call with counsel in Fields v. Smith re experts
1/5/2023	Jon W Davidson	1.8	Work on Dr. Ettner expert report
1/5/2023	Jon W Davidson	0.1	Email Dr. Ettner re phone interview with client
1/7/2023	Jon W Davidson	0.2	Review and edit responses to document requests
1/8/2023	Jon W Davidson	2.4	Work on Dr. Ettner expert report and email to co-counsel
1/9/2023	Jon W Davidson	0.1	Call with Dr. Ettner re interview of client
1/9/2023	Jon W Davidson	0.9	Call with co-counsel re outstanding tasks
1/10/2023	Jon W Davidson	0.2	Review and edit Exhibit A to subpoena to UNC Health Systems
1/12/2023	Jon W Davidson	0.2	Review and edit revised response to request for production of documents
1/12/2023	Jon W Davidson	0.2	Review and edit client deposition preparation questions
1/17/2023	Jon W Davidson	0.1	Emails with co-counsel re marking documents in production as confidential
1/17/2023	Jon W Davidson	0.8	Review defendants' supplemental document production for red flags for client deposition
1/18/2023	Jon W Davidson	1.1	Further review defendants' supplemental document production for red flags for client deposition
1/23/2023	Jon W Davidson	0.1	Review edits to Dr. Ettner expert report and email co-counsel
1/24/2023	Jon W Davidson	1.3	Work on Dr. Ettner expert report
1/24/2023	Jon W Davidson	0.8	Call with co-counsel re client deposition, Dr. Ettner expert report, document review, and client custody issues
1/24/2023	Jon W Davidson	2.1	Work on Dr. Ettner expert report
1/24/2023	Jon W Davidson	0.3	Email Dr. Ettner re expert report
1/27/2023	Jon W Davidson	2.4	Work on revised Ettner expert report
1/31/2023	Jon W Davidson	1.2	Further work on revised expert report
1/31/2023	Jon W Davidson	0.6	Call with co-counsel re Ettner expert report, depositions, and document review
2/1/2023	Jon W Davidson	0.7	Further work on revisions to Dr. Ettner expert report
2/7/2023	Jon W Davidson	0.2	Review and edit 30(b)(6) notice
2/7/2023	Jon W Davidson	0.2	Call with co-counsel re rebuttal expert and 30(b)(6) notice
2/13/2023	Jon W Davidson	2.5	Review and code produced documents
2/14/2023	Jon W Davidson	2.6	Review and code produced documents
2/25/2023	Jon W Davidson	0.2	Research Rule 35 examination issues and email co-counsel
2/17/2023	Jon W Davidson	0.4	Call with client re Rule 35 examination
2/21/2023	Jon W Davidson	0.6	Call with co-counsel re Rule 35 motion and document review
2/21/2023	Jon W Davidson	0.2	Edit opposition to Rule 35 motion
2/23/2023	Jon W Davidson	1	Emails with co-counsel re Rule 35 motion and expert reports deadline
2/27/2023	Jon W Davidson	4.1	Review and code produced documents
2/28/2023	Jon W Davidson	5.3	Review and code produced documents
2/28/2023	Jon W Davidson	0.1	Email Dr. Ettner re interrogatories and document requests
3/1/2023	Jon W Davidson	2.9	Review and code produced documents
3/2/2023	Jon W Davidson	0.6	Call with client re case status
3/3/2023	Jon W Davidson	2.1	Review and code produced documents
3/7/2023	Jon W Davidson	0.4	Call with Dr. Ettner re discovery requests
3/7/2023	Jon W Davidson	0.2	Draft email to co-counsel re 30(b)(6) deposition
3/7/2023	Jon W Davidson	0.3	Call with opposing counsel re 30(b)(6) deposition
3/7/2023	Jon W Davidson	0.8	Call with co-counsel re discovery and settlement issues
3/7/2023	Jon W Davidson	0.5	Research Illinois law re psychometric tests and copyright issues and email Dr. Ettner and co-counsel re research
3/7/2023	Jon W Davidson	0.2	Add hot documents to deposition preparation document and email co-counsel regarding this
3/8/2023	Jon W Davidson	1.6	Review and code produced documents
3/9/2023	Jon W Davidson	0.5	Meet with co-counsel re 30(b)(6) depositions
3/9/2023	Jon W Davidson	4	Review and code produced documents
3/10/2023	Jon W Davidson	0.5	Review newly produced documents and email co-counsel re them
3/14/23	Jon W Davidson	1	Emails and call with co-counsel re depositions and discovery deficiencies
3/15/2023	Jon W Davidson	0.1	Emails with Dr. Ettner re her availability for deposition
3/16/2023	Jon W Davidson	0.1	Review summary judgment motion
3/17/2023	Jon W Davidson	2.2	Draft responses to first set of interrogatories and second set of document requests
3/21/2023	Jon W Davidson	0.6	Call with client re case developments
3/21/2023	Jon W Davidson	0.9	Call with co-counsel re discovery issues
3/21/2023	Jon W Davidson	1.1	Draft and edit responses to first set of interrogatories and second set of document requests
3/22/2023	Jon W Davidson	0.1	Email co-counsel re updating initial disclosures
3/22/2023	Jon W Davidson	0.2	Review and edit supplemental disclosures
3/22/2023	Jon W Davidson	0.1	Email co-counsel re deposition scheduling

3/23/2023	Jon W Davidson	0.3	Compile Dr. Ettner invoices and expert engagement letter and email to Jaclyn Maffetore
3/27/2023	Jon W Davidson	0.5	Finalize responses to first set of interrogatories and second set of document requests
3/27/2023	Jon W Davidson	0.2	Review documents to be produced re confidentiality designations
3/28/2023	Jon W Davidson	1	Call with co-counsel re discovery issues
3/28/2023	Jon W Davidson	0.1	Emails with Dr. Ettner re her availability for deposition
3/29/2023	Jon W Davidson	2.2	Research issues re production of psychometric tests and email Dr. Ettner re this
3/29/2023	Jon W Davidson	0.5	Emails with co-counsel re deposition outlines, settlement conference, and meet and confer letter
3/29/2023	Jon W Davidson	0.8	Research rules re personal attendance at mediation and email counsel re this
3/29/2023	Jon W Davidson	1.7	Further research issues re production of psychometric tests
3/20/2023	Jon W Davidson	0.5	Emails re responses to defendants' counsel re discovery issues and re production of psychometric tests
4/3/2023	Jon W Davidson	1.2	Prepare for and participate in call with Dr. Ettner and Jaclyn Maffetore
4/4/2023	Jon W Davidson	0.1	Call with co-counsel re meet and confer meeting
4/4/2023	Jon W Davidson	0.1	Email opposing counsel re meet and confer meeting
4/4/2023	Jon W Davidson	0.2	Call with co-counsel re meet and confer meeting
4/4/2023	Jon W Davidson	0.5	Email co-counsel re Dr. Peiper 30(b)(6) deposition
4/4/2023	Jon W Davidson	0.1	Meet and confer re psychometric test forms
4/4/2023	Jon W Davidson	0.1	Draft email to opposing counsel meet and confer position and proposal and email co-counsel re reviewing it
4/5/2023	Jon W Davidson	0.2	Review discovery deficiency letter and email co-counsel re it
4/5/2023	Jon W Davidson	0.9	Draft response to opposing counsel re discovery deficiency and email with co-counsel regarding it
4/5/2023	Jon W Davidson	0.2	Draft supplemental response to second set of document production requests
4/12/2023	Jon W Davidson	0.5	Email co-counsel re case management issues
4/12/2023	Jon W Davidson	0.5	Research responsibility for payment of deposition travel costs and email co-counsel re research
4/13/2023	Jon W Davidson	0.3	Call with DOJ attorney re potential statement of interest
4/13/2023	Jon W Davidson	0.7	Call with co-counsel re upcoming depositions and outstanding discovery issues
4/14/2023	Jon W Davidson	0.4	Emails and calls with co-counsel re Dr. Campbell deposition
4/19/2023	Jon W Davidson	0.3	Edit second request for production of documents and email co-counsel re it
4/20/2023	Jon W Davidson	2.8	Work on declaration of Dr. Figler and review supporting documents
4/20/2023	Jon W Davidson	1	Call with co-counsel re discovery issues
4/20/2023	Jon W Davidson	1.2	Draft outline for Dr. Peiper individual deposition
4/20/23	Jon W Davidson	0.5	Emails and call with attorney Ace Factor re Dr. Penn
4/21/2023	Jon W Davidson	0.1	Email National Prison Project attorney re Dr. Penn
4/24/2023	Jon W Davidson	0.2	Review and edit draft Caraccio declaration and email co-counsel re it
4/26/2023	Jon W Davidson	0.1	Draft notice of Dr. Peiper individual deposition
4/27/2023	Jon W Davidson	0.8	Call with client re case status
4/27/2023	Jon W Davidson	0.4	Call with co-counsel re discovery issues
4/27/2023	Jon W Davidson	7.2	Further draft outline for Dr. Peiper individual deposition and collect documents for it
5/1/2023	Jon W Davidson	5	Take Dr. Peiper individual deposition
5/2/2023	Jon W Davidson	1	Call with co-counsel re outstanding discovery issues
5/2/2023	Jon W Davidson	1.3	Review documents to potentially use at Dr. Junker deposition and email co-counsel re them
5/5/2023	Jon W Davidson	0.5	Call with client re litigation update
5/5/2023	Jon W Davidson	0.1	Email opposing counsel re responding to proposed modifications to case management schedule
5/9/2023	Jon W Davidson	0.8	Call with co-counsel re depositions and third party witness issues
5/10/2023	Jon W Davidson	0.5	Research 8 <sup>th</sup> Amendment application to community placements
5/10/2023	Jon W Davidson	2.6	Draft outline for Dr. Sheitman deposition
5/10/2023	Jon W Davidson	0.1	Draft notice of Dr. Sheitman deposition
5/11/2023	Jon W Davidson	0.1	Email opposing counsel with notice of Dr. Sheitman deposition
5/11/2023	Jon W Davidson	0.2	Research information re Emmerita Foster
5/12/2023	Jon W Davidson	4.8	Further draft outline for Dr. Sheitman deposition
5/12/2023	Jon W Davidson	0.6	Review court order modifying deadlines and compare to previous orders and email co-counsel re this
5/14/2023	Jon W Davidson	0.2	Prepare list of exhibits for Dr. Sheitman deposition
5/15/2023	Jon W Davidson	1.3	Emails with co-counsel re depositing Marvella Boman, UNCH documents, Catlett deposition, and discovery extension
5/15/2023	Jon W Davidson	0.1	Call with Jennifer Dula and call with co-counsel re it
5/16/2023	Jon W Davidson	0.8	Email co-counsel re Bowman deposition and discovery cutoff
5/16/2023	Jon W Davidson	0.9	Call with co-counsel re discovery issues
5/16/2023	Jon W Davidson	0.2	Draft email to opposing counsel re discovery deadline and Bowman deposition
5/17/2023	Jon W Davidson	0.5	Prepare for deposition of Dr. Sheitman
5/17/2023	Jon W Davidson	5.2	Take deposition of Dr. Sheitman
5/31/2023	Jon W Davidson	0.2	Work on Dula Declaration
6/1/2023	Jon W Davidson	0.2	Review and respond to emails with co-counsel re defendants' counteroffer re discovery
6/1/2023	Jon W Davidson	0.2	Review second supplemental productions and emails with co-counsel re them
6/4/2023	Jon W Davidson	0.9	Review Peiper individual deposition transcript and email co-counsel re confidentiality designations
6/5/2023	Jon W Davidson	1.2	Review Dula documents and work on Dula declaration
6/6/2023	Jon W Davidson	0.7	Edit Dula declaration
6/6/2023	Jon W Davidson	1	Meet with co-counsel re outstanding tasks
6/7/2023	Jon W Davidson	0.2	Review Clark v. Quiros mediation brief and send to co-counsel
6/7/2023	Jon W Davidson	0.1	Review magistrate's ruling on Rule 35 motion
6/13/2023	Jon W Davidson	0.5	Call with co-counsel re outstanding tasks

6/14/2023	Jon W Davidson	0.3	Revise draft Dula declaration
6/15/2023	Jon W Davidson	0.1	Email Dr. Ettner re deposition availability
6/16/2023	Jon W Davidson	0.5	Review Dr. Sheitman deposition re confidentiality designations
6/20/2023	Jon W Davidson	0.4	Call with co-counsel re outstanding tasks
6/21/2023	Jon W Davidson	0.1	Email opposing counsel with confidentiality designations for Dr. Sheitman deposition transcript
6/27/2023	Jon W Davidson	1	Call with client re litigation update
6/27/2023	Jon W Davidson	1.1	Call with co-counsel re outstanding tasks
6/27/2023	Jon W Davidson	0.1	Email Jennifer Dula re review of her declaration
6/28/2023	Jon W Davidson	0.3	Review settlements in other transgender prisoner cases and email co-counsel re them
7/9/2023	Jon W Davidson	2.2	Review defendants' expert reports and prepare for call with Dr. Ettner
7/10/2023	Jon W Davidson	0.8	Call with Dr. Ettner re rebuttal expert report
7/11/2023	Jon W Davidson	0.1	Emails with co-counsel re rebuttal experts
7/11/23	Jon W Davidson	1	Call with co-counsel re rebuttal experts, Ettner declaration, and other upcoming tasks
7/11/2023	Jon W Davidson	0.5	Call with Dr. Ettner re rebuttal declaration
7/11/2023	Jon W Davidson	0.1	Emails with opposing counsel with Dr. Ettner deposition
7/11/23	Jon W Davidson	0.4	Call with Jennifer Dula re declaration
7/12/2023	Jon W Davidson	0.8	Review defendants' expert reports and analyze topics to be addressed in rebuttal
7/13/2023	Jon W Davidson	1.5	Further review defendants' expert reports and further analyze topics to be addressed in rebuttal
7/13/2023	Jon W Davidson	0.1	Email Dr. Ettner re her rebuttal declaration
7/18/2023	Jon W Davidson	1.4	Work on Dr. Ettner rebuttal declaration based on her draft
7/18/2023	Jon W Davidson	0.8	Call with co-counsel re upcoming tasks
7/19/2023	Jon W Davidson	0.1	Draft Dr. Antommaria expert engagement letter
7/20/2023	Jon W Davidson	0.7	Edit Dr. Ettner expert rebuttal report draft and email her
7/23/2023	Jon W Davidson	0.8	Revise Dr. Ettner expert rebuttal based on her email
7/26/2023	Jon W Davidson	0.7	Further revise Dr. Ettner expert rebuttal report
8/1/2023	Jon W Davidson	0.9	Call with co-counsel re next steps
8/2/2023	Jon W Davidson	0.6	Call with client re potential settlement
8/10/2023	Jon W Davidson	0.1	Emails with co-counsel re defendants' proposal to postpone trial date
8/14/2023	Jon W Davidson	1.2	Prepare for deposition preparation session with Dr. Ettner
8/15/2023	Jon W Davidson	2.6	Further prepare for deposition preparation session with Dr. Ettner
8/16/2023	Jon W Davidson	2.1	Call with Dr. Ettner to prepare her for her deposition
8/17/2023	Jon W Davidson	2.4	Call with Dr. Ettner to further prepare her for her deposition
8/20/2023	Jon W Davidson	6.7	Travel to Chicago for Dr. Ettner deposition
8/21/2023	Jon W Davidson	6.6	Defend deposition of Dr. Ettner
8/22/2023	Jon W Davidson	8.3	Travel back to Los Angeles from Dr. Ettner deposition
8/23/2023	Jon W Davidson	0.5	Call with client re litigation updates
8/23/2023	Jon W Davidson	1	Call with co-counsel re case status and upcoming tasks
8/24/2023	Jon W Davidson	0.9	Work on Croft declaration
8/25/2023	Jon W Davidson	0.8	Further work on Croft declaration
8/28/2023	Jon W Davidson	0.4	Call with co-counsel re upcoming tasks
9/5/2023	Jon W Davidson	0.3	Incorporate edits to Croft declaration
9/7/2023	Jon W Davidson	0.2	Edit revised Dr. Figler declaration
9/7/2023	Jon W Davidson	0.2	Edit revised Dr. Caraccio declaration
9/12/2023	Jon W Davidson	0.8	Call with co-counsel re summary judgment motion and trial
9/12/2023	Jon W Davidson	0.2	Research issues re partial summary judgment and email co-counsel re that
9/14/2023	Jon W Davidson	0.5	Review Dr. Ettner deposition transcript for confidentiality designations
9/14/2023	Jon W Davidson	0.5	Call with client re litigation developments
9/14/2023	Jon W Davidson	0.2	Draft joint motion for extension of summary judgment page limits
9/14/2023	Jon W Davidson	0.2	Prepare Dr. Ettner errata sheet and emails with Dr. Ettner
9/15/2023	Jon W Davidson	1.7	Review Dr. Peiper deposition for summary judgment motion support
9/15/2023	Jon W Davidson	0.2	Research issues re payment of expert witnesses and email co-counsel re that
9/19/2023	Jon W Davidson	1.5	Further review Dr. Peiper deposition for summary judgment motion support
9/19/2023	Jon W Davidson	2.1	Review Dr. Sheitman deposition for summary judgment motion support
9/20/2023	Jon W Davidson	1.4	Further review Dr. Sheitman deposition for summary judgment motion support
9/26/2023	Jon W Davidson	0.1	Review protection order and local rules re filing under seal and email co-counsel re these
9/27/2023	Jon W Davidson	1.5	Draft second client declaration
9/27/2023	Jon W Davidson	1.5	Edit brief in support of motion for partial summary judgment
9/28/2023	Jon W Davidson	0.2	Edit second client declaration
9/28/2023	Jon W Davidson	1	Call with co-counsel re motion for partial summary judgment
9/28/2023	Jon W Davidson	0.8	Review expert reports and depositions for necessary redactions
9/28/2023	Jon W Davidson	1.3	Prepare list of deposition references from Drs. Peiper and Sheitman depositions for motion for partial summary judgment
9/3/2023	Jon W Davidson	2.7	Edit brief in support motion for partial summary judgment
10/2/2023	Jon W Davidson	1.9	Further edit brief in support of motion for summary judgment
10/2/2023	Jon W Davidson	0.6	Call with client re second declaration
10/3/2023	Jon W Davidson	2.5	Review confidential documents defendants want to cite for necessary redaction
10/4/2023	Jon W Davidson	1.1	Further edit brief in support of motion for partial summary judgment



10/4/2023	Jon W Davidson	1	Cite check documents re facts relied on in brief in support of motion for partial summary judgment
10/10/2023	Jon W Davidson	0.5	Review and analyze defendants' motion for summary judgment
10/10/2023	Jon W Davidson	0.5	Call with co-counsel re opposition to defendants' motion for summary judgment
10/10/2023	Jon W Davidson	2.4	Research "low-quality" evidence issues and draft memo to co-counsel re those
10/16/2023	Jon W Davidson	1.9	Edit opposition to defendants' motion for summary judgment
10/19/2023	Jon W Davidson	0.6	Edit further revised opposition to defendant's motion for summary judgment
10/19/2023	Jon W Davidson	0.7	Review and analyze defendants' opposition to plaintiff's motion for partial summary judgment
10/20/2023	Jon W Davidson	0.5	Further analyze defendants' opposition to plaintiff's motion for partial summary judgment
10/24/2023	Jon W Davidson	0.4	Edit revised reply to opposition to plaintiff's motion for partial summary judgment
10/25/2023	Jon W Davidson	0.7	Cite-check reply to opposition to reply to opposition to plaintiff's motion for partial summary judgment
11/6/2023	Jon W Davidson	2.2	Prepare questions for moot of summary judgment motions argument
11/7/2023	Jon W Davidson	1.2	Moot argument of summary judgment motions
11/30/2023	Jon W Davidson	0.7	Call with client re litigation status
2/2/2024	Jon W Davidson	0.1	Review court order re summary judgment motions and evidentiary hearing
2/2/2024	Jon W Davidson	0.6	Call with co-counsel re evidentiary hearing
2/2/2024	Jon W Davidson	0.2	Review Dr. Ettner deposition and expert reports in preparation for evidentiary hearing
2/3/2024	Jon W Davidson	0.7	Email co-counsel re Ettner testimony for evidentiary hearing
2/3/2024	Jon W Davidson	1.6	Prepare for call with Dr. Ettner re evidentiary hearing testimony
2/5/2024	Jon W Davidson	1.2	Call with Dr. Ettner re draft declaration regarding remote testimony
2/5/2024	Jon W Davidson	0.5	Call with co-counsel re medical necessity issues
2/5/2023	Jon W Davidson	0.5	Review WPATH SOC 7 and email co-counsel re medical necessity issues
2/5/2023	Jon W Davidson	1.3	Further review WPATH SOC 7 and email co-counsel with helpful quotes
2/6/2023	Jon W Davidson	1.1	Call with co-counsel re evidentiary tasks
2/6/2023	Jon W Davidson	1.5	Review WPATH materials re testimony of Dr. Ettner at evidentiary hearing
2/7/2023	Jon W Davidson	2.2	Prepare questions for Dr. Ettner direct testimony at evidentiary hearing
2/8/2023	Jon W Davidson	0.3	Edit motion to permit remote testimony of Dr. Ettner and memo in support
2/8/2024	Jon W Davidson	0.4	Call with opposing counsel re evidentiary hearing logistics
2/8/2024	Jon W Davidson	0.4	Call with co-counsel re evidentiary hearing and potential settlement
2/8/2024	Jon W Davidson	0.2	Call with client re evidentiary hearing and potential settlement
2/8/2024	Jon W Davidson	0.5	Review Peiper and Junker depositions re case summary
2/8/2024	Jon W Davidson	0.5	Call with co-counsel re defendants' proposal re evidentiary hearing
2/8/2024	Jon W Davidson	0.2	Email co-counsel re admissions in testimony of Dr. Peiper
2/8/2024	Jon W Davidson	2.6	Prepare questions for Dr. Ettner direct at evidentiary hearing
2/9/2024	Jon W Davidson	0.1	Emails with Dr. Ettner re remote testimony at evidentiary hearing
2/9/2024	Jon W Davidson	2.8	Prepare further questions for Dr. Ettner direct at evidentiary hearing
2/10/2024	Jon W Davidson	2	Prepare direct examination of Dr. Ettner for evidentiary hearing
2/11/2024	Jon W Davidson	2.9	Further prepare direct examination of Dr. Ettner for evidentiary hearing
2/13/2024	Jon W Davidson	1.1	Revise Dr. Ettner direct testimony questions for evidentiary hearing
2/13/2024	Jon W Davidson	1.2	Call with co-counsel re evidentiary hearing issues
2/14/2024	Jon W Davidson	0.9	Prepare for evidentiary hearing preparation session with Dr. Ettner
2/14/2024	Jon W Davidson	2	Call with Dr. Ettner to prepare for evidentiary hearing
2/14/2024	Jon W Davidson	0.8	Review Edmo transcript in preparation for evidentiary hearing
2/14/2024	Jon W Davidson	2.5	Revise direct examination questions for evidentiary hearing
2/15/2024	Jon W Davidson	4.1	Draft potential cross-examination questions for preparation session with Dr. Ettner
2/16/2024	Jon W Davidson	0.5	Prepare for cross preparation for Dr. Ettner
2/16/2024	Jon W Davidson	2.8	Call with Dr. Ettner and co-counsel re direct and cross-examination at evidentiary hearing
2/16/2024	Jon W Davidson	1.9	Prepare for evidentiary hearing
2/17/2024	Jon W Davidson	0.7	Call with co-counsel re evidentiary hearing
2/17/2024	Jon W Davidson	3.4	Review defendants' compilation of medical records to prepare Dr. Ettner and note necessary redactions
2/18/2024	Jon W Davidson	1.5	Call with Dr. Ettner re evidentiary hearing testimony
2/18/2024	Jon W Davidson	3.8	Prepare for evidentiary hearing, draft timeline, and email co-counsel
2/19/2024	Jon W Davidson	9.5	Travel to Charlotte for evidentiary hearing
2/20/2024	Jon W Davidson	2	Go to courthouse and test technology for remote testimony
2/20/2024	Jon W Davidson	1.2	Meet with co-counsel for final preparation for evidentiary hearing
2/20/2024	Jon W Davidson	4	Attend evidentiary hearing and conduct direct examination and respond to cross-examination at it
2/21/2024	Jon W Davidson	9	Travel to Los Angeles after evidentiary hearing
2/28/2024	Jon W Davidson	1.4	Edit brief in support or renewed motion for summary judgment
2/29/2024	Jon W Davidson	0.4	Cite check renewed motion for summary judgment
3/21/2024	Jon W Davidson	0.6	Review and analyze defendants' opposition to plaintiff's motion for summary judgment and defendants' motion for summary judgment
3/22/2024	Jon W Davidson	0.4	Call with co-counsel re reply to opposition to plaintiff's motion for summary judgment and settlement issues
3/22/2024	Jon W Davidson	0.8	Draft email to co-counsel re reply to opposition to plaintiff's motion for summary judgment
3/25/2024	Jon W Davidson	0.7	Edit reply to opposition to plaintiff's motion for summary judgment
4/1/2024	Jon W Davidson	0.2	Edit revised opposition to defendants' renewed motion for summary judgment
4/16/2024	Jon W Davidson	0.4	Review summary judgment order and email co-counsel
4/17/2024	Jon W Davidson	0.7	Call with client re summary judgment order
4/18/2024	Jon W Davidson	0.5	Call with co-counsel re summary judgment order

5/16/2024	Jon W Davidson	0.5	Review defendants' motion for stay and email co-counsel re opposition
5/28/2024	Jon W Davidson	0.5	Emails re notice of appearance and prepare and file notice of appearance
5/28/2024	Jon W Davidson	0.2	Call with co-counsel re appeal
5/31/2024	Jon W Davidson	0.7	Review defendants' reply to opposition motion for stay and email co-counsel
6/4/2024	Jon W Davidson	0.6	Call with co-counsel re stay motion and appeal
6/6/2024	Jon W Davidson	0.8	Research re motion to vacate stay
6/14/2024	Jon W Davidson	0.2	Edit motion to vacate stay
6/17/2024	Jon W Davidson	0.3	Edit revised motion to stay
7/3/2024	Jon W Davidson	0.2	Edit draft of opposition to defendants' motion to extend opening brief deadline
7/10/2024	Jon W Davidson	0.4	Research and emails re mandamus
7/16/2024	Jon W Davidson	1	Call with client re litigation developments
7/16/2024	Jon W Davidson	0.9	Call with co-counsel re stay pending appeal, appellate briefing, and necessary research
7/17/2024	Jon W Davidson	0.1	Call Fourth Circuit clerk re opposition to stay and temporary stay motion
7/19/2024	Jon W Davidson	0.2	Edit opposition to stay motion
7/20/2024	Jon W Davidson	0.2	Edit revised opposition to stay motion
7/21/2024	Jon W Davidson	0.2	Edit further revised opposition to stay motion
7/24/2024	Jon W Davidson	0.1	Emails with co-counsel re joint appendix
7/26/2024	Jon W Davidson	2	Review Fourth Circuit order denying stay and emails with co-counsel re it
7/29/2024	Jon W Davidson	0.6	Review and edits response to defendants' proposal for compliance with injunction
7/30/2024	Jon W Davidson	1.3	Review defendants' Fourth Circuit brief and analyze opposing arguments
7/30/2024	Jon W Davidson	0.8	Meet with co-counsel re response to defendants' Fourth Circuit Brief
8/1/2024	Jon W Davidson	0.3	Call with client re appeal
8/5/2024	Jon W Davidson	0.8	Research issues re appealability of denial of summary judgment as part of appeal of grant to other party of summary judgment and email co-counsel re research
8/13/2024	Jon W Davidson	0.2	Call with co-counsel re Fourth Circuit brief
8/14/2024	Jon W Davidson	1.3	Edit Fourth Circuit brief
8/15/2024	Jon W Davidson	2.9	Research issues raised in Fourth Circuit brief and further edit it
8/20/2024	Jon W Davidson	1.2	Edit revised Fourth Circuit brief
8/21/2024	Jon W Davidson	1.6	Cite check Fourth Circuit brief
9/22/2024	Jon W Davidson	0.5	Call with client re appeal
9/10/2024	Jon W Davidson	0.4	Call with co-counsel re Fourth Circuit argument and potential mootness
9/16/2024	Jon W Davidson	0.2	Review defendants' Fourth Circuit reply brief
10/22/2024	Jon W Davidson	0.2	Call with co-counsel re motion to dismiss appeal as moot
10/30/2024	Jon W Davidson	0.3	Edit motion to dismiss appeal
10/31/2024	Jon W Davidson	1.1	Research vacatur and email co-counsel re research
11/4/2024	Jon W Davidson	0.1	Review Fourth Circuit order re supplemental briefing re mootness
11/6/2024	Jon W Davidson	0.2	Review defendants' notice of compliance with injunction and report of Drs. Renberg and Simopoulos and email co-counsel re non-compliance
11/7/2024	Jon W Davidson	0.6	Call with co-counsel re response to defendants' notice of compliance with injunction
11/7/2024	Jon W Davidson	0.7	Further research vacatur and email co-counsel re research
11/11/2024	Jon W Davidson	2.3	Research and draft section of Fourth Circuit brief re vacatur
11/14/2024	Jon W Davidson	0.1	Edit Fourth Circuit brief re mootness and vacatur
11/18/2024	Jon W Davidson	0.5	Cite check Fourth Circuit brief re mootness and vacatur
11/20/2024	Jon W Davidson	0.2	Review and edit response to defendants' notice of compliance with injunction
11/26/2024	Jon W Davidson	0.1	Review order re dismissal of appeal
6/29/2025	Jon W Davidson	2.8	Compile time for fee motion
7/14/2025	Jon W Davidson	1.8	Draft declaration in support of fee motion
7/14/2025	Jon W Davidson	0.3	Edit brief in support of fee motion
7/17/2025	Jon W Davidson	0.1	Edit draft declaration in support of fee motion

Total hours: 364.3

## Attachment 2

Project/Time entry	User	Start date	Time (decimal)
Review documents and prepare notes on documents	Li Nowlin-Sohl	03/02/2023	1.000
Team call re 30b6 deposition, depositions, and discovery	Li Nowlin-Sohl	03/07/2023	0.800
Team call re 30b6 deposition strategy and outlines	Li Nowlin-Sohl	03/09/2023	0.500
Review documents from Defendants and prepare notes on documents	Li Nowlin-Sohl	03/09/2023	1.900
Call with team re discovery and depositions	Li Nowlin-Sohl	03/14/2023	1.000
Team call re discovery, depositions, and mediation	Li Nowlin-Sohl	03/28/2023	1.000
Review documents for Hahn deposition and prepare deposition outline	Li Nowlin-Sohl	04/02/2023	3.000
Prepare Dr. Hahn deposition outline	Li Nowlin-Sohl	04/04/2023	2.900
Prepare Dr. Hahn deposition outline	Li Nowlin-Sohl	04/06/2023	3.300
Revise and finalize Dr. Hahn deposition outline	Li Nowlin-Sohl	04/10/2023	2.300
Conduct Dr. Hahn Deposition	Li Nowlin-Sohl	04/11/2023	7.800
Team call regarding discovery, depositions, and litigation strategy	Li Nowlin-Sohl	05/09/2023	0.800
Team call re mediation and discovery	Li Nowlin-Sohl	06/28/2023	0.300
Review Dr. Li report and prepare notes re same	Li Nowlin-Sohl	07/15/2023	2.700
Review and comment on Antommara rebuttal report	Li Nowlin-Sohl	08/01/2023	1.500
Review and comment on Antommara rebuttal report	Li Nowlin-Sohl	08/02/2023	0.800
Prepare outline for Dr. Li Deposition	Li Nowlin-Sohl	08/03/2023	5.600
Review and provide final comments to Antommara rebuttal report	Li Nowlin-Sohl	08/06/2023	1.300
Prepare outline for Dr. Li Deposition	Li Nowlin-Sohl	08/07/2023	4.600
Team call re litigation strategy, summary judgment, and depositions	Li Nowlin-Sohl	08/23/2023	1.000
Prepare Dr. Antommara for deposition	Li Nowlin-Sohl	09/05/2023	1.100
Defend deposition of Dr. Antommara	Li Nowlin-Sohl	09/07/2023	2.000
Prepare Daubert motion re Dr. Li	Li Nowlin-Sohl	10/21/2023	4.000
Prepare Daubert motion re Dr. Li	Li Nowlin-Sohl	10/22/2023	3.500
Revise Daubert motion re Dr. Li	Li Nowlin-Sohl	10/23/2023	4.800
Review and take notes on Sheitman deposition in preparation for cross examination	Li Nowlin-Sohl	02/08/2024	2.900
Prepare Sheitman cross examination outline	Li Nowlin-Sohl	02/12/2024	1.500
Prepare Sheitman cross examination outline	Li Nowlin-Sohl	02/13/2024	4.400
Review and revise direct examination outline for Dr. Ettner	Li Nowlin-Sohl	02/14/2024	2.100
Hearing preparation meeting with Dr. Ettner	Li Nowlin-Sohl	02/14/2024	2.000
Revise Sheitman cross examination outline	Li Nowlin-Sohl	02/15/2024	2.700
Hearing prep call with team	Li Nowlin-Sohl	02/17/2024	0.900



## Attachment 2

Project/Time entry	User	Start date	Time (decimal)
Prepare for evidentiary hearing	Li Nowlin-Sohl	02/20/2024	1.000
Evidentiary Hearing	Li Nowlin-Sohl	02/20/2024	3.800
Review and revise renewed motion for summary judgment	Li Nowlin-Sohl	02/27/2024	0.700
Team call re response to motion for summary judgment strategy	Li Nowlin-Sohl	03/22/2024	0.600
Compile time for fee motion	Li Nowlin-Sohl	07/14/2025	0.700
<b>Total</b>			<b>82.800</b>

**Attachment 3**

*Zayre-Brown v. North Carolina Department of Adult Correction*  
American Civil Liberties Union Foundation Travel Expenses

<b>Date</b>	<b>Expense Description</b>	<b>Attorney</b>	<b>Purpose</b>	<b>Amount</b>
4/16-18/23	Airfare	Brown	Take Peiper 30(b)(6) deposition in Raleigh, NC	\$417.70
4/16-18/23	Ground transportation	Brown	Take Peiper 30(b)(6) deposition in Raleigh, NC	\$199.82
4/16-18/23	Lodging	Brown	Take Peiper 30(b)(6) deposition in Raleigh, NC	\$985.49
8/20-22/23	Airfare	Davidson	Defend Ettner deposition in Chicago, IL	\$591.15
8/20-22/23	Airport parking and ground transportation	Davidson	Defend Ettner deposition in Chicago, IL	\$177.34
8/20-22/23	Lodging	Davidson	Defend Ettner deposition in Chicago, IL	\$407.14
2/19-21/24	Airfare	Davidson	Evidentiary hearing in Charlotte, NC	\$1,434.70
8/20-22/23	Airfare	Nowlin-Sohl	Evidentiary hearing in Charlotte, NC	\$988.70
8/20-22/23	Airport parking and ground transportation	Davidson	Evidentiary hearing in Charlotte, NC	\$193.85
8/20-22/23	Ground transportation	Nowlin-Sohl	Evidentiary hearing in Charlotte, NC	\$67.67

8/20-22/23	Lodging	Davidson	Evidentiary hearing in Charlotte, NC	\$416.36
8/20-22/23	Lodging	Nowlin-Sohl	Evidentiary hearing in Charlotte, NC	\$352.08
<b>TOTAL</b>				<b>\$6,246.35</b>